

State Water Resources Control Board

February 3, 2017

(Via email and Certified Mail)
CERTIFIED MAIL
NO. 7015 1520 0001 8017 1672

Mr. Karl Vogeley
Fleet Manager
City of Glendale Public Works
541 West Chevy Chase Drive
Glendale, California 91204
kvogelely@glendaleca.gov

**SUBJECT: NOTICE OF VIOLATION; UNDERGROUND STORAGE TANK SYSTEMS
LOCATED AT GLENDALE FIRE DEPARTMENT GARAGE, 210 EAST PALMER
AVENUE, GLENDALE**

Dear Mr. Vogeley:

As part of an initiative by the State Water Resources Control Board (State Water Board) to ensure compliance at government-owned and/or operated underground storage tank (UST) facilities in California, the State Water Board staff inspected the USTs at your facility on January 25, 2017, pursuant to authority under Health and Safety Code (H&SC), chapter 6.7, section 25289.

The State Water Board has identified the following violations pursuant to H&SC, chapter 6.7, and California Code of Regulations (CCR), title 23, chapter 16:

No.	Violation	Tank	Start Date	Stop Date	Regulation
1	Failure to Maintain Operating Permit – The operating permit onsite had an expiration date of December 31, 2016.	All	January 1, 2017	Ongoing	H&SC 25284(a)
2	Failure to Maintain Financial Responsibility – The Certificate of Financial Responsibility form is incorrect and must be updated to list the Chief Financial Officer (CFO) letter in the mechanism type column, in addition to the existing State UST Cleanup Fund.	All	January 25, 2017	Ongoing	H&SC 25292.2; 23 CCR 2711(a)(11)

No.	Violation	Tank	Start Date	Stop Date	Regulation
3	Failure to Maintain Facility Tank Information Form A – The UST Facility Operating Permit Application in CERS (Form A) lists self-insured, however, the CFO Letter and Certificate of Financial Responsibility states UST Cleanup Fund is being used.	All	January 25, 2017	Ongoing	23 CCR 2711(a)
4	Failure to Maintain Facility and Tank Information Form B – The UST Tank Information in CERS (Form B) does not list the emergency generator in the Tank Use and Contents section.	Tank 1	January 25, 2017	Ongoing	23 CCR 2711(a)
5	Failure to Maintain Monitoring Plan – The monitoring plan in CERS does not include the Vaporless Manufacturing, Inc. (VMI) line leak detector (LLD).	Tank 1	January 25, 2017	Ongoing	H&SC 25286(a); 23 CCR 2632(d)(1), 2711(a)(9)
6	Failure to Perform Annual LLD Testing – VMI line leak detector is not being tested and certified annually.	Tank 1	October 1, 2015	Ongoing	H&SC 25291(f); 23 CCR 2638
7	Failure to Continuously Monitor Emergency Generator Pressurized Piping – In lieu of having a LLD for the emergency generator pressurized piping, the monitoring system must be checked daily by either remote electronic access or onsite visual inspections. A log of daily checks was not available. Additionally, a 0.1 gallon per hour line tightness test must be conducted annually.	Tank 1	January 25, 2017	Ongoing	23 CCR 2636(f)(4) and (6)
8	Failure to Meet Designated Operator (DO) Inspection Requirements – The alarm history reports or logs were not attached to each monthly DO inspection record. The DO form used does not document all actions taken in response to alarms.	All	January 1, 2016	Ongoing	23 CCR 2715(c)
9	Failure to Monitor Product Piping – The sensor in UDC 3/4 was not located at the lowest point and was unable to detect a leak at the earliest opportunity.	UDC 3/4	January 25, 2017	Ongoing	23 CCR 2630(d)

No.	Violation	Tank	Start Date	Stop Date	Regulation
10	Failure to Maintain Monitoring or Testing Records Onsite – The 2014 spill containment test was not onsite at the time of inspection.	All	January 25, 2017	Ongoing	23 CCR 2712(b)
11	Failure to Perform Secondary Containment Testing – The previous secondary containment test was conducted July 25-29, 2013. The next secondary containment test was due by July 29, 2016; however, it was conducted on August 9, 2016.	All	August 1, 2016	August 9, 2016	23 CCR 2637(a)

You are directed to correct the ongoing violations and submit compliance documentation to the State Water Board and Glendale City Fire Department within thirty (30) days from the date of this letter. Have your DO make specific notations in the next monthly DO report indicating the ongoing violations have been corrected. The monthly DO report and any associated photos must be submitted as proof of compliance. Please ensure all onsite documents for this facility list the 210 East Palmer Avenue address and not the 1201 South Glendale Avenue address. UDC 3/4 sump contained debris; remove debris and provide documentation, such as a photograph, showing the debris has been removed.

Please send all compliance documentation to the following:

State Water Board

Ms. Rebecca Green
UST Enforcement Unit
Office of Enforcement
State Water Resources Control Board
801 K Street, Suite 2300
Sacramento, California 95814
rebecca.green@waterboards.ca.gov

Local CUPA

Mr. Thomas Marchant
Fire Battalion Chief
Glendale City Fire Department
421 Oak Street
Glendale, California 91208
tmarchant@glendaleca.gov

Pursuant to Health and Safety Code, chapter 6.7, section 25299, the owner and operator of the tank(s) are liable for a penalty of \$500 to \$5,000 per tank, per day of violation. These penalties will continue to accrue until the violations have been corrected.

If you have any questions, please contact me at (916) 341-5551, or by email at amantha.henkel@waterboards.ca.gov.

Sincerely,



Amantha Henkel
Senior Environmental Scientist
UST Enforcement Unit
Office of Enforcement

cc: See next page

cc: *(via email only)*

Mr. Thomas Marchant
Fire Battalion Chief
Glendale City Fire Department
tmarchant@glendaleca.gov